

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA

v.

EDWARD M. BURKE,  
PETER J. ANDREWS, and  
CHARLES CUI

Case No. 19-CR-322

Hon. Robert M. Dow, Jr.

**DEFENDANT CHARLES CUI'S  
UNOPPOSED MOTION TO MODIFY TRAVEL RESTRICTIONS**

Defendant Charles Cui, by and through his undersigned counsel, respectfully moves this Honorable Court to enter an agreed order modifying the conditions of his release to allow him to travel outside the Northern District of Illinois in order to travel with his family to: (i) the states of Indiana and North Carolina from July 27, 2021, through August 1, 2021; and (2) the state of Indiana from September 2, 2021, through September 5, 2021. In support of this motion, Mr. Cui states as follows:

1. On April 18, 2019, Mr. Cui was arraigned and entered a plea of not guilty. Bond was set at \$10,000.00 own recognizance, and Mr. Cui's travel was restricted to the Northern District of Illinois. (ECF Nos. 19–20.)

2. Previously, on July 22, 2019, the Court granted Mr. Cui's motion to modify his travel restrictions to allow Mr. Cui to travel with his family to North Carolina from July 29, 2019 through August 4, 2019, and to allow Mr. Cui to travel without date restriction to his second home in Benton Harbor, Michigan, which is

located in the Western District of Michigan and which Mr. Cui visits on occasion with his family. (ECF No. 62.)

3. Similarly: (i) on December 3, 2019, the Court granted Mr. Cui's motion to modify his travel restrictions to allow him to travel with his family to the state of Florida over the holiday season, (ECF No. 66); (ii) on July 22, 2020, the Court granted Mr. Cui's motion to modify his travel restrictions to allow him to travel with his family to state of North Carolina (ECF No. 80); and (iii) on December 4, 2020, the Court granted Mr. Cui's motion to modify his travel restrictions to allow him to travel with his family to the state of Florida over the holiday season, (ECF No. 133).

4. Here, Mr. Cui respectfully seeks this Court's permission to travel with his family from the Northern District of Illinois to the states of Indiana and North Carolina. Mr. Cui's family plans on leaving on July 27, 2021, and returning on August 1, 2021, to visit Indiana and North Carolina. Mr. Cui's family plans on leaving September 2, 2021, through September 5, 2021, to visit Indiana.

5. Pretrial Services previously informed counsel that Mr. Cui is not under Pretrial's supervision and that Pretrial took no position regarding expanding Mr. Cui's travel beyond the Northern District of Illinois.

6. The undersigned also conferred with the Assistant United States Attorneys handling this matter. The Government has indicated it has no objection to the relief sought in this motion.

7. Consistent with the Court's standing order, Mr. Cui is contemporaneously submitting a proposed agreed order in electronic format to "Proposed\_Order\_Dow@ilnd.uscourts.gov" for the Court's consideration.

WHEREFORE, Defendant Charles Cui respectfully requests that the Court enter an Order modifying the conditions of his release to allow him to travel outside the Northern District of Illinois in order to travel with his family to: (i) the states of Indiana and North Carolina from July 27, 2021, through August 1, 2021; and (2) the state of Indiana from September 2, 2021, through September 5, 2021.

Dated: July 21, 2021

Respectfully submitted,

By: /s/ Tinos Diamantatos

Tinos Diamantatos  
Megan R. Braden  
Alex D. Berger

MORGAN, LEWIS & BOCKIUS LLP  
110 North Wacker Drive, Suite 2800  
Chicago, IL 60606-1511  
Telephone: +1.312.324.1000  
Facsimile: +1.312.324.1001  
tinodiamantatos@morganlewis.com  
meganbraden@morganlewis.com  
alexberger@morganlewis.com

*Counsel for Defendant Charles Cui*

**CERTIFICATE OF SERVICE**

I, Alex D. Berger, an attorney, hereby certify that a copy of the foregoing was filed on July 21, 2021 using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Alex David Berger  
Alex D. Berger